

EXHIBIT 45

1 IN RE NATIONAL PRESCRIPTION OPIATE LITIGATION

2 MDL No. 2804

3 Case No. 17-md-2804

4 Judge Dan Aaron Polster

5 THIS RELATES TO:

6
7 THE COUNTY OF CUYAHOGA, OHIO, ET AL VS. PURDUE
8 PHARMA L.P., ET AL CASE NUMBER 18-OP-45004
9

10 VIDEO DEPOSITION OF

11 CLAIRE KASPAR

12 JANUARY 15, 2019

13 DEPOSITION HELD AT KELLEY & FERRARO

14 950 MAIN AVENUE, SUITE 1300

15 CLEVELAND, OH 44113
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1 in mortality attributable to accidental overdose in
2 association with substance abuse. Our results in
3 Cuyahoga County indicate that while OPR deaths have
4 reason in recent years, the most dramatic rise in
5 accidental drug deaths has been due to heroin. As
6 DAH, and again, that's death attributable to heroin,
7 right?

8 A Uh-huh.

9 Q As DAH in Cuyahoga County have risen, our
10 data indicate that OPR deaths appear to have reached
11 a plateau. This suggests that the addicted
12 population may be transitioning to heroin, possibly
13 for cost and/or availability reasons.

14 Little evidence has been published
15 documenting transitions from OPR to heroin, but
16 given the similar pharmacological effects of the
17 two, this shifting trend in mortality is disturbing
18 and requires further monitoring on a national level.

19 Did I read that correctly?

20 A Yes.

21 Q So is it true that at this time Cuyahoga
22 County the largest driver of overdose deaths was
23 heroin?

24 A Yes.

25 Q And in looking at the next paragraph it

1 Q So the vast majority of the chart it looks
2 like it is at zero and then all of the sudden,
3 again, between 2015 and 2016, there's a dramatic
4 spike.

5 Do you see that?

6 A Yes.

7 Q And this purple line represents
8 carfentanil?

9 A Yes.

10 Q And from 2015 to 2016 it goes from zero
11 overdose deaths to 56 carfentanil deaths?

12 A Yes.

13 Q From 2016 to 2017 looks like there were,
14 jumped again from 56 carfentanil overdose deaths to
15 191 carfentanil overdose deaths?

16 A Yes.

17 Q So based on this chart, is it fair to say
18 the vast majority of the overdose deaths you have
19 been seeing in recent years have been attributable
20 to heroin, cocaine, carfentanil and Fentanyl?

21 A Can you reask that question?

22 Q Sure. Um, we can broaden the question.
23 Based on your experience at CCME0 in recent years
24 say from 2015 going forward, the drugs that have
25 been primarily responsible for the vast majority of

1 overdose deaths have been heroin, cocaine,
2 carfentanil and Fentanyl, is that accurate?

3 A That is accurate. I just want to point
4 out that a number of these cases have multiple of
5 those drugs involved.

6 Q Uh-huh.

7 A So when you are seeing these numbers, it
8 is not that 492 were only Fentanyl, you know what
9 I'm saying? They can have all of those involved.

10 Q I think I understand what you are saying.
11 So if we take 2016 as an example to illustrate what
12 you are saying, if we just added up, for instance,
13 the numbers of Fentanyl, heroin, cocaine, and
14 carfentanil, we would get a number that is much
15 higher than 666 right?

16 A Yes.

17 Q There are only 666 overdose deaths in
18 2016, right?

19 A Yes.

20 Q So in reaching that 666 figure, there were
21 people who overdose on multiple substances, right?

22 A Yes.

23 Q Is that what you were trying to explain?

24 A Multiple substances were included in the
25 cause of death for these cases.